

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN (Detroit)**

In re:  
Brandon Heitmann

Debtor.

Case No. 24-41956-mar  
Chapter 13  
Hon. Mark A. Randon

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**OBJECTIONS TO CONFIRMATION**

NOW COMES Associated Bank ("Creditor"), by and through its attorneys, Trott Law, P.C., and hereby Objects to Confirmation as follows:

1. Creditor is a holder of a mortgage on real property owned by the Debtor(s) and located at 60749 Forest Creek Dr, Washington, MI 48094-1846.
2. The mortgage is in material default pursuant to the Creditor's records.
3. Debtor(s) Chapter 13 Plan proposes to pay Creditor as a Class 4.1 regular monthly payment of \$5,302.00 and as a Class 4.2 payment on pre-petition arrearage of \$48,431.00 at the rate of \$812.18 per month over 60 months.
4. According to Creditor's records, Creditor must receive the regular monthly payment of \$5,329.73 plus a pre-petition arrearage of approximately \$38,685.64 at the rate of at least \$1,074.60 per month in order for the arrearage to be cured within a reasonable length of time, i.e., 36 months.
5. Debtor(s) proposed Chapter 13 Plan understates the ongoing monthly mortgage payment.
6. Pursuant to 11 U.S.C. §§ 1322(a)(1) and (b)(5) the Debtor(s) Plan is underfunded.
7. Debtor(s) Chapter 13 Plan cannot be confirmed pursuant to 11 U.S.C. § 1325 as it fails to comply with the requirements of 11 U.S.C. §§ 1322(b)(3) and (b)(5).

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WHEREFORE, Creditor prays that Confirmation be denied, the bankruptcy case dismissed, and for whatever other relief the Court deems just and equitable.

Respectfully Submitted,  
Trott Law, P.C.

Dated: April 5, 2024

/s/ Heather Burnard  
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